

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LOUIS ROBINSON,)	
)	
Plaintiff,)	
)	
v.)	Case No. 24 cv 05954
)	
REYNALDO GUEVARA, et al.,)	Judge Franklin U. Valderrama
)	
Defendants.)	Magistrate Judge Beth W. Jantz

**PARTIES' JOINT MOTION FOR EXTENSION OF TIME
TO COMPLETE OMNIBUS DISCOVERY MOTIONS**

The Parties, by and through their undersigned attorneys, move this Court for a brief extension of time to complete their omnibus discovery motions. In support thereof, the Parties state the following:

1. On November 6, 2025, this Court ordered that the Parties file their omnibus discovery motions by November 21, 2025. Dkt. 127.
2. Since then, the Parties have been inundated with previously unforeseen professional and personal obligations.
3. Additionally, undersigned counsel for Defendant Guevara was ill and required time to recover.
4. As such, the Parties jointly request an extension of three business days, up to and including November 26, 2025, to file their respective omnibus discovery motions.
5. This brief extension is not sought for purposes of delay, and no Party is prejudiced by this extension.

Wherefore, the Parties request this Honorable Court grant this motion any other such relief which this Court deems proper.

Dated: November 17, 2025

Respectfully Submitted,

/s/ Austin Rahe

AUSTIN RAHE

One of the Attorneys for City of Chicago

Rock Fusco & Connelly, LLC
333 W. Wacker Drive, 19th Floor
Chicago, IL 60606
P: (312) 494-1000
arahe@rfclaw.com

/s/ Jeffrey C. Grossich

JEFFREY C. GROSSICH

*One of the Attorneys for Wojcik, Engel, Mosquera,
Echevarria, Mingey, Biebel, Yanow, and Valdez*

The Sotos Law Firm, P.C.
141 W. Jackson Blvd, Suite 1240A
Chicago, IL 60604
P: (630) 735-3300
jgrossich@jsotoslaw.com

/s/ Christiane E. Murray

CHRISTIANE E. MURRAY

One of the Attorneys for Reynaldo Guevara

Borkan & Scahill, Ltd
20 S. Clark Street, Suite 1700
Chicago, IL 60603
P: (312) 580-1030
cmurray@borkanscahill.com

/s/ Tom Kayes

TOM KAYES

One of the Attorneys for Plaintiff

Loevy & Loevy
311 North Aberdeen St., 3rd Floor
Chicago, IL 60607
P: (312)243-5900
kayes@loevy.com